

Anti-Corruption Policy
Thantawan Industry Public Company Limited

Anti-Corruption Policy

Thantawan Industry Public Company Limited "The Company" has a policy to promote morality, ethics, and transparency by emphasizing on fair business practices to all relevant person in and outside of the industry which included shareholders, employees, customers, partners / creditors, competitors and society.

The Company determines principles of unsupportive activities of a group or persons who act inappropriately in seeking for benefits in order to make sure that the operation will be carry out without corruption. Therefore, the Company has set up a policy to conduct the business and communicate to the Board of Directors, managing directors, faculty of management and employees at all levels are strictly adhered not to perform or accept corruption at all, no matter in a direct or indirect way.

Every relevant departments are comprehensive to review the implementation of anti-corruption policy regularly. As well as reviewing the guidelines together with the requirements for various operations. In order to comply with business changes, regulations and legal requirements.

Definition

Peculation and Corruption

Means the misuse of power and authority. For instance, offering gifts and services, offering cash or cash replacement items. Along with giving bribery to government officials, government agencies and private agencies as well. Regardless to any forms of offer, offering for contracts, commitments, receiving cash, or other improper profits. In addition, concealing truth or information are forbidden and illegal. It is against the company policies, immoral, and unethical in doing business. Moreover, availing benefits for yourself and acquaintances in a falsifying way is unacceptable. Except it is a traditional act that were accepted by the laws.

Political Assistance

Meaning to help, whether in cash or other forms to support political activities. As well as encouraging employees to participate in political activities on behalf of the company, without aiming for a business advantage. Such as, providing goods or advertising services, promoting or supporting political parties, and buying tickets to raise funds or donate money to organizations that are close to political party.

Charitable Donation

Means financial assistance or other forms. Such as, giving knowledge or spend time to be a part of social contribution activities, donate company's product. As well as publicizing and enhancing the good image of the company, without aiming for business results in return.

Financial Support

Means giving cash or cash replacement items to support and promote the company.

Giving or Receiving Gifts, Reception Service Fee, Accommodation budget, and Other Expenses

Means giving or receiving gifts, reception fees, and other expenses. Which will not affect the company's performance according to relevant laws. Giving or receiving gifts on behalf of the company's name on specific festivals. Such as, New Year's festival, Songkran, and Chinese New Year. Can be considered as a normal practice and is openly.

Roles and Responsibilities

Board of Directors

Has a role to consider and approve policies. In order to ensure and supervise the system to have anti-corruption mind set. The board and the Management Committee should acknowledges the anti-corruption policy. Together with adhering to the guidelines of the employees to the entire organization.

Nomination Committee Determine Compensation and Good Corporate Governance

Duty to set policies and supervising compliance with anti-corruption. In order to present to the board of directors for consideration and approves. Along with giving advices to the managing director and senior executives to have responsibility to implement an anti-corruption policy.

Audit Committee

Duty to review and evaluate internal controls, financial report, preparation, and other processes related to Anti-Corruption Policy. To ensure that the company has complied with the laws and regulations for the criteria of the company as determined. Having proper segregation of duties and responsibilities including reviewing internal controls. Which regarding to anti-corruption measures with personnel working in advance, before reporting the results to the board of directors.

Risk Management Committee

The duty of assessing the opportunities and impact of risk factors that may be caused by corruption. As well as determination risk management policy and placing the risk management framework of the company. Including supervising, monitoring and reviewing risk management reports. To ensure the confident of effective risk management that are suitable for operating the business of the company. Then report the results to the Board of Directors.

Managing Director and Senior Management

Duty to receive the authority and responsibility for implementing anti-corruption. For instance having a system to support the anti-corruption policy and pass it down to employees along with all related parties. Reviewing the appropriateness of the internal control system. In order to consistent with business changes, regulations, and legal requirements. Including the audit report, according to the anti-corruption policy to the Audit Committee, Nomination Committee, Determine remuneration and good corporate governance and the Board of Directors Consistently.

Policies and guidelines on anti-corruption

The Board of Directors, Management Committee, and Employees do not perform anything related to corruption in all forms, both directly and indirectly by

1. The company prohibits directors, executives, and employees of the company from doing any act that is tended to be corruption. Such as, giving or receiving bribes to or from government officials, Government agencies, private agencies, or stakeholders related to the company. In order to gain or maintain business trade advantages and competition.
2. The company prohibits directors, executives and employees from demanding the operation or accepting corruption for the benefit of oneself, family, brothers, friends, and acquaintances.
3. The company has authorized the directors, executives and employees of the company must work carefully in the work process that has a high risk of corruption. Such as, Sales and procurement, marketing, investment project, contracting, giving and receiving gifts, Souvenirs or other benefits, Reception, giving donations, supporting funds, etc.
4. The company has authorized the directors, executives and employees of the company take action on giving or accepting donations for supports in the right way. According with the company regulations and required by law ensuring that donations or financial support are not used for bribery.
5. The company has authorized the directors, executives and employees of the company cautious in making transactions with person, or any organization that is questioned about corruption.
6. The company prohibits directors, executives, and employees of the company from neglecting or ignoring when seeing acts that are considered to be corruption related to the company. Which is considered as duty to inform the director or the person in responsible. Be cooperate in examining various the truth.
7. The company will provide fairness and protection to those who have refused corruption or informing clues about Corruption to the company. As specified in the whistleblowing measures

and mechanisms to protect whistleblowers. As well as the cooperators in the reporting of corruption. Regarding the specified Company's whistleblowing policy or complaint (Whistleblower Policy) with the Code of Conduct of the Company.

8. The company will consider and punish anyone that found implicating with corruption. Which is considered as unethical act according to the regulations of the employee's discipline. The person may be punished by the law if the act is illegal.
9. The company will disseminate knowledge and understanding, to anyone who must work with the company or may affect the company. In order to comply with the anti-corruption policy.
10. The company has provided an inspection process and accurate internal control systems. Which is effective enough to prevent corruption.
11. The Company has reviewed the anti-corruption policy, practice guidelines and requirements for implementation in accordance with the change of business regulations and legal requirements.
12. The company provides human resource management processes that aimed at anti-corruption measures, since selecting, training, evaluating, giving rewards and firing positions. As specified in the operation manual, which is considered part of the anti-corruption policy as well.
13. The company has a policy in which there is a risk of corruption. For the directors, executives, and employees of the company must perform duties with care in the following manner.
 - 13.1. Political assistance has the following policies.

1. The company has a policy to conduct business in a neutral manner. Not based on anything politically or any political party. The company adheres it in political neutrality supporting compliance with the law and government. In accordance with the democratic system, the company has no policy to support, help the activities of political parties or politicians both directly and indirectly.

2. The company does not support money or possession of goods for political parties, politicians or candidates for election. Any political to exchange for special privileges or falsify benefits both direct and indirect way.

3. Directors, executives, and employees of the company, has the rights of participation. In political activities under the provisions of constitution. On the other hand, they have no right to impersonate company employees, or use any of the company's equipment. In order to benefit themselves from participating in political activities.

13.2. Charitable donations and support have policies as follows.

1. Charitable donations both in the form of financial assistance or other forms. Such as giving knowledge or devote the time, etc. The company can be a part of social activities as well as public relations. It will enhance the good image for the company without aiming for business returns.

2. Giving money to supporting money or possession of cash substitution to activities or projects must be conducted with transparency legally and must specify the name of the provider in company's name. Going through compliance with the regulations of the company. Regarding the social organization and anti-social practices, such will not be used in criminal attacks. Community and society as well as public relations and company's image by creating various forms. Such as job creation, income, community, educating people in the prototype.

13.3 Activity arrangement to Corporate Social Responsibilities are policies as follows.

1. Activity arrangement corporate social responsibility both in the form of financial assistance or other forms such as, providing knowledge, taking time to deliver products to support activities, environmental conservation, etc. The company can be a part of social return activities as well as public relations and enhance good image for the company without looking forward to business in returns.

2. Conducting Social responsibility activities, whether by money or possession of cash instead. Must proceed with transparency, legally right, and must specify the name of the provider in the name of the company only. By going through the approval process in accordance with the company's regulations and make sure that social responsibility activities will not be used for corruption. Which may be done in many forms, such as creating jobs, creating income, including communities educating people in the community etc.

13.4. Gifts, hospitality services, certification and other expenses policies are as follows.

1. The company prohibits directors, executives, and employees of the company demanding gifts, souvenirs or any other benefits from contractors, suppliers, vendors, joint ventures, or those with related interests with the business of the company regardless of any circumstances.

2. Directors, executives, and employees of the company should not give, receive or promise to give benefits or any possessions to motivate them. In order to perform or omit the practice. Including any actions that are considered in the event that the company detecting violations of ethics and morality. In this case the company will consider disciplinary action according to the policy, personal regulations for those who violate the policy and procedures.

3. In the case of gifts souvenirs that were given to the company are from special events of the company. Such as signing the contract, or Joint venture of the company. If receiving awards or souvenirs from participating in social contribution activities, we allow employees to receive on behalf of the company.

4. Directors, executives, and employees of the company should not offer gifts to supervisors and the supervisor should not agree with or intend to let relatives receive gifts from employees. No subordinate, except in the case of normal, conventional, that has given gifts to each other. The value should not be exceeding 3,000 baht (three thousand baht only)

5. Directors, executives, and employees of the company can give or receive gifts, hospitality services and business partners under the money operating regulations. If entering the following conditions

5.1. Giving: Gift giving due to business opportunities such as establishment date, establishment signing business contracts is allowed. On the other hand, if the value of gifts, souvenirs or other benefits exceeds 3,000 baht (three thousand baht only) must consider approval from the Managing Director or according to the company's regulations.

5.2. Receiving: - Receiving or giving items should be worth not more than 3,000 baht (three thousand baht only), not in cash forms, not illegally. Moreover, it must not to retribution or compensation people to gain an advantage or benefits through improper or hidden actions.

- Openly acting and do not conceal in the name of the company. Must not be on behalf of employee's name.

- Comply with relevant laws, rules and regulations of the company as specified in the approval authority regulations, financial regulations, etc.

- It is appropriate and correct according to time. Such as giving small gifts during important festivals which are customary.

5.3. Refrain from giving or receiving gifts. Including hospitality certified government officials Government agencies Private agency and any other person during the contest price.

6. Giving gifts Souvenirs, if you cannot refuse to receive a gift or festive benefits for normal practice worth over 3,000 baht (three thousand baht only). Get directors, executives, and employees of the company who can receive gifts or benefits according to the events or normal practice. It must be informed to the supervisor before receiving. If the supervisor considers that he should not receive gifts and souvenirs or any other benefit, immediately returned to the provider. If unable to return, deliver to the supervisor to be the rights of the company and to send gifts to the Managing Director to collect and prepare a report of receiving gifts. To be used as awards for employees in important festivals or donate for further public charity as appropriate.

13.4. Accepting proposals, meetings, training, seminars and business visits using budget of partners, directors, executives, and employees of the company can receive proposals, meetings, training, seminars and business visits using the partner's budget. If entering the following conditions

1. Not being a guideline or rewarding person to gain an advantage or benefit through improper or hidden actions
2. If the meeting, training, seminar and business visit of the business partner is in accordance with the agreement specified in the contract.
3. Comply with relevant laws, rules and regulations of the company as specified.

Whistleblowing measures and protection mechanisms for whistleblowers Clue notification measures

To ensure equal treatment for all stakeholders and fair according to the principles Corporate Governance. The Company has provided channels for notifying clues, complaints, comments, or any suggestions. That stakeholders are affected or anyone that will be affected, and will cause damage to the stakeholders to lose all groups from the business of the company. Reporting the practice of directors, executives, or employees of the company about the violation of laws or ethics. Including behavior that may indicate corruption, unfair practice, lack of care and lack of prudence through the following channels

1. By mail, Chairman of the Board of Directors or Chairman of the Audit Committee, Thantawan Industry Public Company Limited No. 123 Sun Tower Building 32, Vibhavadi Rangsit Road, Chomphon Subdistrict, Chatuchak District, Bangkok 10900
2. Email to the Chairman of the Board of Directors And Chairman of the Audit Committee board-thip@thantawan.com
3. Company website www.thantawan.com
4. Suggestion box / comments / complaints within the company channel for reporting clues as a safe channel. Able to give clues to the person when requesting information, clues to the informer later, or instructions regarding compliance Anti-corruption measures. In this regard, the company will conduct the examination according to the procedure and record the investigation in writing. Without disclosing the name of the whistleblower Including the collection of complaints To protect the impact May occur with those who report such clues

Whistleblower Protection Mechanism

To protect the rights of the complainant and the person who provided the information in good faith. The company will conceal the name, address of any information that can identify the complainant or informant. By keeping the information of the complainant and the person who provided the information is confidential. Only those who are responsible for checking the complaint will be able to access information.

In the case of complaints regarding corruption of the directors or executive. Audit Committee will protect the whistleblower, the complainant, witness and person who provided information in the investigation of the facts. Not to be affected by danger, unrighteousness caused by clues, complaints, witnesses or providing information.

Those who are responsible for complaints must keep the information, complaints and documents of the complainant, including those who provide information confidential. Do not disclose information to other people who are not involved. Unless it is disclosed as required by law.

Investigation

If receiving corruption information or clues from within the organization, The Board of Directors will give The Audit Committee considers the internal auditor to collect evidence. Or appoint an investigation committee Facts are investigators and summarize the results of the investigation to the Audit Committee for further consideration

If receiving corruption information or any clues from the agency that supervises the company, or from outside the organization, the Board of Directors will consider the internal auditor to gather evidence. We might appoint an investigation committee. Facts are investigators and summarize the results of the investigation to the Board of Directors for further consideration.

Penalty

The company will consider and punish those who are guilty of corruption as employees in accordance with the regulations. Disciplinary punishment of employees specified by the company and may be punished or may be claimed for damages as required by law. If a person committing a corruption offense is a director to comply with relevant legal procedures and may be punished or may be claimed for damages as required by law

Training and communication

1. The company has written recommendations on anti-corruption measures in writing. Providing channels for publishing such as posting announcements in public relations boards Intranet system, email, website of the company etc. For everyone in the organization to understand, accept and comply with the anti-corruption policy appropriately.

2. The company provides continuous training for directors, executives, and employees of the company, to create truly. Regarding anti-corruption policies Company expectations and know the penalty for those who do not follow this measure

3. The company provides communication and disseminating anti-corruption policies. Including channels to report clues, complaints and penalties. If they do not comply with anti-corruption policies let the person within the company acknowledge through multiple channels. Such as orientation for new directors, executives and employees annual training or seminars. Announcements in public relations boards Intranet system, email, company website etc. for everyone in the company to understand, accept and abide by the anti-corruption policy seriously.

4. The Company communicates and disseminates anti-corruption policies. Including a channel for reporting clues or complaints to the public, subsidiaries, associates, other companies. The company have control power and business representatives related business partners and stakeholders through various channels. Such as the company's website, annual report list, annual information, etc., to create understanding and supports to adhere the standards of social responsibility in the fight against corruption as the company.

If any employee is unaware that any action may be a corruption, or in the case of questions or concerns, the employee should consult the Nomination Committee. Determine compensation and good corporate governance or secretary of the Nomination Committee Determine compensation with good corporate governance.

Assessment and risk prevention

The company has provided risk management. Which covers risks in strategy, finance, operations, rules, information technology, organization and external factors. Including the risk of corruption.

By requiring all departments to participate in the assessment of potential risks to look for control measures to manage the noise. Including the follow-up of 1 quarter per quarter and assessing the risk at least once a year.

Internal control system

1. Procurement system, the company provides procedures for dealing with procurement and enforcement systems within the company. To control every step related to the procurement process. Hire, which is done through the system and store as evidence for reference and can be checked.

2. Sales system, the company provides the operational procedures related to the sales system. Along with enforced within the company, to control every Steps related to the sales process. Which is done through the system and store as evidence for reference and can be checked.

3. Accounting System, the Company provides accounting records in accordance with financial reporting standards. The regulations of the office Securities Regulatory Commission and the Stock Exchange by operating

through the system. Together with store as evidence for reference and can be checked. Various accounting records must have the appropriate details that are correctly specifying the payment transaction, purchase, and asset management clear transaction objectives. There is no counterfeiting of accounting records and related documents to hide real transactions.

Human resource management

1) The company has provided human resource management process. From recruiting and selecting personnel. Fading positions, training, employee performance, evaluation, and compensation by requiring supervisors. All levels of communication and understanding with employees regarding anti-corruption policy. For the use in business activities that is in charge and control to be more effective.

2) The company provides an orientation process for new employees. To allow employees to understand about the anti- Corruption policy, Company expectations, and including penalties. If employees do not follow this policy.

3) The Company provides continuous training for directors, executives, and employees of the Company to truly understand. Regarding anti-corruption policies company expectations, including penalties if employees do not comply with this policy.

4) The company has provided the human resource management process. That gives justice and protect employees who refused or report corruption relating to the company. Which will not reduce the position, punish or give negative results to employees. Even if doing so will cause the company to lose opportunities in doing business. The company provides channels for whistleblowing and protection of safety reporting. When employees want to provide information or clues as well as suggestions about practices in accordance with the anti-corruption policy.

Monitoring and Review

1. Nomination Committee Determine compensation and good corporate governance, must review this policy annually and propose to the Board of Directors for approval. If there is a change, including the supervision and follow the policy implementation. This issue goes into practice and provide various suggestions continuously.

2. The internal auditor will examine the internal control system and processes. Such as sales, marketing processes, Purchasing process, and other support processes of the company regularly. In order to ensure that the control system internal effectiveness is sufficient to combat corruption. Including discussing the results of the audit with related parties. To find appropriate solutions and inspection reports for the management together with the Audit Committee. Further acknowledged if there is an urgent issue, the Internal Audit Department will notify directly to the Chairman of the Audit Committee immediately.

3. The Audit Committee will review the adequacy along with appropriateness of the internal control system and the risk management process of the company. In order to ensure the efficiency and effectiveness of the Company's operations are transparency.

4. The internal auditor will monitor the progress of the corrective approach that is properly resolved and report the results. Follow-up to the management team and the Audit Committee for further acknowledgment.

This Charter has been approved by the Nomination, Remuneration and Corporate Governance Committee's Meeting No. 3/2018 on August 14, 2018.

This Charter was approved by the Board of Directors Meeting No. 7/2018 on August 14, 2018.